

# **Exhibit 18**

## **New York Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**New York – Meta Proposal**

**Search Terms:** Meta made its most recent counterproposal on December 6, 2024 to the New York (i) Council on Children and Families, (ii) Department of Education, (iii) Department of Health, (iv) Office of Children and Family Services, (v) Office of Mental Health, (vi) Office of the Governor, and (vii) State Division of Budget. At a high level, Meta’s proposal involves using search combinations that require “Social Media Terms,” “Harm Terms,” or “Other Case Issue Terms” to occur “within 200” of one of the following “Youth Terms”:

(teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR “under-age” OR juvenile\* OR “pre-teen\*” OR preteen\* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen\* z” OR “gen-z” OR “gen\* alpha” OR gen-a\* OR student\* OR pupil\*)

#	Search Set 1 – Youth Use of Social Media
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”) w/200 “Youth Terms”
	Search Set 2 – Youth Mental Health / Wellbeing Issues
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia therap* OR counsel*) w/200 “Youth Terms”
3.	(“pro-ana” OR “BMI” OR obes* OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*) w/200 “Youth Terms”
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR extort OR exploit*) w/200 “Youth Terms”
5.	(violen* OR abus* OR assault* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) w/200 “Youth Terms”
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime OR staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”) w/200 “Youth Terms”

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7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/200 “Youth Terms”
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/200 “Youth Terms”
9.	(negative w/3 (appearance OR experience OR affect* OR effect*)) w/200 “Youth Terms”
10.	(compar* w/5 (appearance OR social OR other* OR negative)) w/200 “Youth Terms”
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) w/200 “Youth Terms”
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)) w/200 “Youth Terms”
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc”) w/200 “Youth Terms”
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) w/200 “Youth Terms”
15.	“ACE” OR “ACEs” OR “adverse childhood experience” OR “adverse childhood experiences”
<b>Search Set 3 – Other Case Issues</b>	
16.	(policy OR policies OR practices OR practice OR presentation OR assembl* OR initiative* OR legislation OR advocacy OR lobby* OR legislat* OR suspend* OR revok* OR fine* OR sanction* OR ban OR banned OR banning OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”) w/200 “Youth Terms” AND (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”))

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**Custodians:** Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by New York during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

The New York Attorney General’s Office has not proposed custodians for the New York Governor’s office or State Division of Budget. Nor has it produced information that is sufficient to allow Meta to identify a representative set of custodians that covers the relevant time period and subject matter for each agency. Accordingly, to the extent those agencies are directed again to participate in the agency discovery process, Meta requests that the Court require those New York agencies to identify custodians that meet that criteria within three days of the Court’s order resolving this dispute. Meta reserves the right to request additional custodians in a meet and confer to be scheduled promptly after the agencies’ disclosure of an initial proposed custodian set.

Agency	Custodian	Title
Council on Children and Families	Elana Marton*	Not provided.
Council on Children and Families	Vanessa Threatte*	Not provided.
Council on Children and Families	Keith Howard*	Not provided.
Council on Children and Families	Samantha McQuibban*	Not provided.
Council on Children and Families	Dimple Patel*	Not provided.

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Council on Children and Families	Melinda Sanderson*	Not provided.
Council on Children and Families	Diana Urso*	Not provided.
Council on Children and Families	Joseph DeBonza*	Not provided.
Council on Children and Families	Yan Wu*	Not provided.
Council on Children and Families	Kristin Weller*	Not provided.
Department of Education	Alina Buccella	Senior Manager, Office of Counsel
Department of Education	Louise DeCandia	Chief Privacy Officer, Office of Counsel
Department of Education	Judy Swierczewski	Supervising Attorney, Office of Counsel
Department of Education	Chelsea Swilling	Litigation Manager, Office of Counsel
Department of Education	Maribeth Barney	Director, Office of Student Support Services
Department of Education	Jonathan Burman	Spokesman, Communications Office
Department of Education	Paul Cardettino	Coordinator, Educational Design & Technology, Office of Standards & Instruction

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Education	Robyn Cotrona	Senior Attorney, Chief Privacy Office, Office of Counsel
Department of Education	Kathleen DeCataldo	Assistant Commissioner for Student Support Services (former)
Department of Education	P.J. O’Hare	Director of Communications, Communications Office
Department of Education	Karen Hollowood	Supervisor of Education Programs – Student Centered Educational Policy Unit, Office of Student Support Services
Department of Education	Yufan Huang	Executive Coordinator, Office of Information and Reporting Services
Department of Education	Ann Lanoue	Associate, School Nursing, Office of Student Support Services
Department of Education	Shannon Logan	Director of Standards, Instruction, and Educational Technology in the Office of Standards & Instruction
Department of Education	Julia Patane	Legislative Counsel, Office of Counsel
Department of Education	Gemma Rinefierd	Assistant Commissioner for Student Support Services, Office of Student Support Services
Department of Health	Shirleen McClarren*	Not provided.
Department of Health	Bianca Sanders*	Not provided.
Department of Health	Suzanne Swan*	Not provided.
Department of Health	Eric Zasada*	Not provided.

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Health	Amir Bassiri*	Not provided.
Department of Health	Jack Pitera*	Not provided.
Department of Health	Stephanie Sheehan*	Not provided.
Office of Children and Family Services	Nina Aledort*	Not provided.
Office of Children and Family Services	Kerri Barber*	Not provided.
Office of Children and Family Services	Thomas Brooks*	Not provided.
Office of Children and Family Services	Christopher Bruno*	Not provided.
Office of Children and Family Services	Sheletha Chang*	Not provided.
Office of Children and Family Services	Theodore Chmielewski*	Not provided.
Office of Children and Family Services	Evelyn D'Ambro*	Not provided.
Office of Children and Family Services	Amanda Darling*	Not provided.

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of Children and Family Services	Sandra Davidson*	Not provided.
Office of Children and Family Services	Jason DeSantis*	Not provided.
Office of Children and Family Services	Gail Geohagen-Pratt*	Not provided.
Office of Children and Family Services	Heather Girard*	Not provided.
Office of Children and Family Services	Kristin Gleeson*	Not provided.
Office of Children and Family Services	Jim Hart*	Not provided.
Office of Children and Family Services	Madeline Hehir*	Not provided.
Office of Children and Family Services	Phil Ingram*	Not provided.
Office of Children and Family Services	Donna Linhares-LaPietra*	Not provided.
Office of Children and Family Services	John Lockwood*	Not provided.
Office of Children and Family Services	Karen Male*	Not provided.



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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of Children and Family Services	Patricia Mantey*	Not provided.
Office of Children and Family Services	David Nasner*	Not provided.
Office of Children and Family Services	Kim Perry*	Not provided.
Office of Children and Family Services	Suzanne Schanz*	Not provided.
Office of Children and Family Services	Sara Simon*	Not provided.
Office of Children and Family Services	Michael Stevens*	Not provided.
Office of Children and Family Services	Joseph Tomassone*	Not provided.
Office of Children and Family Services	Casey Vincelette*	Not provided.
Office of Mental Health	Sarah Kuriakose*	Not provided.
Office of Mental Health	Meredith Ray-Labatt*	Not provided.
Office of Mental Health	Bonnie Catlin*	Not provided.
Office of Mental Health	Audrey Erazo-Trivino*	Not provided.

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of Mental Health	Allison Trujillo*	Not provided.
Office of Mental Health	Jessica Zahn*	Not provided.
Office of Mental Health	Emily Luddy*	Not provided.
Office of Mental Health	Thomas Smith*	Not provided.
Office of Mental Health	Loretta Santilli*	Not provided.
Office of Mental Health	Bob Moon*	Not provided.
Office of Mental Health	Matthew Perkins*	Not provided.
Office of Mental Health	Ben Rosen*	Not provided.
Office of Mental Health	Jennifer Hernandez*	Not provided.
Office of Mental Health	Crystal Lewis*	Not provided.
Office of Mental Health	Paula Tambasco*	Not provided.
Office of Mental Health	Jessica McGinn*	Not provided.
Office of Mental Health	Helen-Maria Lekas*	Not provided.
Office of Mental Health	Gregory Eves*	Not provided.
Office of Mental Health	Justin Mason*	Not provided.

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of Mental Health	Jim Plastiras*	Not provided.
Office of Mental Health	Mark Genovese*	Not provided.
Office of Mental Health	Joe Katagiri*	Not provided.
Office of Mental Health	Heather Martin*	Not provided.
Office of Mental Health	Christopher Smith*	Not provided.
Office of Mental Health	Beth Giarusso*	Not provided.
Office of Mental Health	Elisabeth Iskander*	Not provided.

## New York Agency Discovery Proposals

### **Search Terms for Office of Mental Health (OMH), Office of Children and Family Services (OCFS), Council on Children and Families (CCF), Department of Health (DOH)**

No.	Search Term
1	("social media" OR (Meta OR Facebook OR Instagram OR Threads OR WhatsApp)) w/20 ((teen* OR child* OR youth) w/10 ("mental health" OR well* OR "addict*"))
2	("social media" OR (Meta OR Facebook OR Instagram OR Threads OR WhatsApp)) w/20 ((teen* OR child* OR youth) w/10 ((cause* OR contribut* OR limit*) AND (use OR usage OR time)))
3	("social media" OR (Meta OR Facebook OR Instagram OR Threads OR WhatsApp)) w/20 ((teen* OR child* OR youth) w/10 ("parent* control*" OR "parent* notif*" OR "age verif*"))
4	("social media" OR (Meta OR Facebook OR Instagram OR Threads OR WhatsApp)) w/20 ((child* OR youth) w/10 ("personal information" OR "data") w/5 ("collect" OR "share"))

### **OMH Custodians**

Sarah Kuriakose, Meredith Ray-Labatt, Bonnie Catlin, Audrey Erazo-Trivino, Allison Trujillo, Jessica Zahn, Emily Luddy, Thomas Smith, Loretta Santilli, Bob Moon, Matthew Perkins, Ben Rosen, Jennifer Hernandez, Crystal Lewis, Paula Tambasco, Jessica McGinn, Helen-Maria Lekas, Gregory Eves, Justin Mason, Jim Plastiras, Mark Genovese, Joe Katagiri, Heather Martin, Christopher Smith, Beth Giarrusso, and Elisabeth Iskander.

### **OCFS Custodians**

OCFS is working voluntarily to identify potential custodians who currently work at the agency. Given the breadth of Meta's requests, the agency has had difficulty identifying custodians who used to work there that could have potentially relevant documents from earlier in Meta's broad time period, which is why OCFS ran terms across all email inboxes from 2015 to the present.

### **CCF Custodians**

Elana Marton, Vanessa Threatte, Keith Howard, Samantha McQuibban, Dimple Patel, Melinda Sanderson, Diane Urso, Joseph DeBonza, Yan Wu, and Kristin Weller.

### **DOH Custodians**

Shirleen McClarren, Bianca Sanders, Suzanne Swan, Eric Zasada, Amir Bassiri Jack Pitera, and Stephanie Sheehan.

**New York State Department of Education (NYSED)****Proposed Search Terms**

No.	Search Term
1	“social media”
2	Facebook
3	Instagram
4	“screen time”
5	“video game”
6	“cellphone” or “cell phone”
7	“youth risk behavior survey”

**NYSED Custodians**

Alina Buccella, Louise DeCandia, Judy Swierczewski, Chelsea Swilling, Maribeth Barney, Jonathan Burman, Paul Cardettino, Robyn Cotrona, Kathleen DeCataldo, P.J. O’Hare, Karen Hollowood, Yufan Huang, Ann Lanoue, Shannon Logan, Julia Patane, Gemma Rinefierd, Carri Manchester, Gwyn Marcshman, Michele Shahren, Lisa Pingelski, John Brock, and Allison Connors.